

Ensuring compliance with environmental regulations in the Eastern Partnership countries

POLICY HIGHLIGHTS



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Abbreviations and acronyms

DES	Department of Environmental Supervision
EaP	Eastern Partnership
EECCA	Eastern Europe, Caucasus and Central Asia
EIEC	Environmental Information and Education Centre
ELD	Environmental Liability Directive
EMBLAS	Environmental Monitoring in the Black Sea
EPMIB	Environmental Protection and Mining Inspection Body of Armenia
EU	European Union
EUFJE	European Forum of Judges for the Environment
EU4Environment	European Union for Environment
GIZ	German Agency for International Co-operation
IED	Industrial Emissions Directive
IMPEL	European Union Network for the Implementation and Enforcement of Environmental Law
MENR	Ministry of Ecology and Natural Resources of Azerbaijan
MEPA	Ministry of Environmental Protection and Agriculture of Georgia
NGO	Non-governmental organisation
OECD	Organisation for Economic Co-operation and Development
PRTR	Pollutant Release and Transfer Register
SEI	State Environmental Inspectorate of Ukraine
SESS	State Environmental Security Service
TAIEX	Technical Assistance and Information Exchange Instrument of the European Commission

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Foreword

In line with global commitments and the Eastern Partnership (EaP) framework, the European Union has supported its partner countries with strengthening their liability regimes and environmental compliance assurance systems. In particular, the “EU4Environment” programme provided targeted analysis, capacity building and networking using relevant EU legislation and practices as benchmarks. The OECD, an implementing partner in the programme, provided the analysis needed to support this process, conducting comprehensive reviews of compliance assurance systems and recommending reforms.

This brochure presents the results of this collaboration and highlights evidence that international co-operation and support helped EaP countries to advance relevant legislative and institutional reforms. Some EaP countries strengthened their environmental inspectorates and adopted risk-based approaches for inspection planning, focusing on the highest-risk polluters to enable a more effective and efficient use of scarce resources. Others established a more integrated approach through laws on industrial emissions and an environmental liability regime. They also expanded promotion of voluntary compliance through sharing information on how to comply.

Ensuring compliance with environmental regulations is crucial for protecting the environment and public

health. Compliance also fosters fair competition among companies and thus a favourable investment climate. Assisting the regulated community to understand and meet environmental requirements, monitoring compliance and addressing non-compliance also contribute towards upholding the rule of law, good governance, and public trust in institutions, key for all countries and pivotal for alignment efforts of countries on the enlargement path.

While EaP countries have improved the legal foundation for environmental compliance, implementation challenges persist in areas such as integrity, institutional co-ordination, non-digitised information management and lack of systematic training for staff. In addition, inspectors still mostly rely on imposing fines rather than using other forms of compliance promotion and assurance.

Momentum is building for further improvements of environmental compliance assurance and this brochure outlines recommendations for further action. It reflects the ongoing commitment of both the European Union and OECD to supporting better environmental policies and compliance in the EaP countries. We are optimistic that these improvements will not only ensure higher environmental well-being in these countries but also serve as critical contributions to our collective journey towards a sustainable, green transformation.



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Introduction to environmental compliance assurance

WHAT IS ENVIRONMENTAL COMPLIANCE ASSURANCE?

Environmental compliance assurance is governmental activity to ensure that regulated entities adhere to environmental laws and regulations. It comprises preventive, diagnostic and corrective actions:

- **promoting** environmental compliance by helping regulated entities understand the requirements and incentivising them to adopt green practices through information (e.g. training, advice, guidance) or economic instruments (e.g. environmental taxes). This represents the “preventive” part of compliance assurance.
- **monitoring** environmental compliance through approaches such as planned and ad hoc on-site inspections, examining ambient monitoring data and self-monitoring reports by companies, and processing and addressing reports from the public or police investigations. This represents the “diagnostic” part of compliance assurance.
- **enforcing** compliance by sanctioning non-compliant entities and obliging them to rectify the damage

caused. Enforcement includes issuing official warnings or imposing improvement measures, undertaking administrative or criminal proceedings, and applying sanctions or demanding remedial actions. These represent the “corrective” part of compliance assurance, which aims at restoring compliance and deterring future non-compliance.

These components are complementary. For example, compliance promotion can prevent behaviour that would otherwise require monitoring or a non-compliance response. Similarly, monitoring can help better target compliance promotion or enforcement activities.

Environmental compliance assurance needs to be supported by a clear and effective environmental regulatory regime. This should comprise integrated permitting for large enterprises. It must embody a life-cycle approach, starting with effective design of legislation and ending with the review and revision of legislative and implementation measures. There must also be a robust institutional framework.

WHY IS ENVIRONMENTAL COMPLIANCE ASSURANCE IMPORTANT?

Ensuring environmental compliance is important to address key environmental challenges, implement environmental laws and policies, and promote sustainable development. It has many societal and economic benefits, including:

- protection of the environment and public health
- achievement of better environmental outcomes at lower overall costs
- maintenance of a level playing field among companies
- increase of investor confidence by reducing business risk
- stimulation of innovation and creation of new jobs

- strengthened public trust in governmental environmental policy
- promotion of the rule of law and good governance
- promotion of transparency.



Key EU legislation on environmental compliance assurance

EU Minimum Criteria for Environmental Inspections

Sets minimum criteria for organising, performing, following up on and publishing the results of environmental inspections

EU Environmental Liability Directive (ELD)

Establishes a comprehensive EU-wide liability regime for environmental damage based on the Polluter-Pays Principle

EU Environmental Crime Directive

Sets a minimum standard of environmental protection through criminal law

EU Industrial Emissions Directive (IED)

Aims to achieve a high level of protection of human health and the environment as a whole by reducing harmful industrial emissions

Key OECD instruments on environmental compliance assurance

OECD Council Recommendation on Environmental Compliance Assurance

The Recommendation was adopted at the Ministerial Council Meeting (MCM) on 8 June 2023.

The Recommendation provides an essential reference point for adherents in the area of environmental policy implementation. It identifies measures to further strengthen environmental rule of law. To that end, it covers all three pillars of environmental compliance assurance – promotion, monitoring and enforcement – as well as institutional aspects.

The Recommendation is supported by the OECD Compendium of good practices in promoting, monitoring and enforcing environmental compliance, which was adopted in August 2022. The Compendium summarises two decades of OECD best practices in environmental compliance assurance.



The OECD Regulatory Enforcement and Inspections Toolkit

The Toolkit, adopted in 2018, offers government officials, regulators, stakeholders and experts a simple tool for assessing the inspection and enforcement system in a given jurisdiction, institution or structure.

Its checklist of 12 criteria can be used to identify strengths and weaknesses, gauge actual performance and pinpoint areas for improvement.

The Toolkit is based on the 2014 OECD Best Practice Principles for Regulatory Enforcement and Inspection, which address the design of the policies, institutions and tools to promote effective compliance – and the process of reforming inspection services to achieve results.



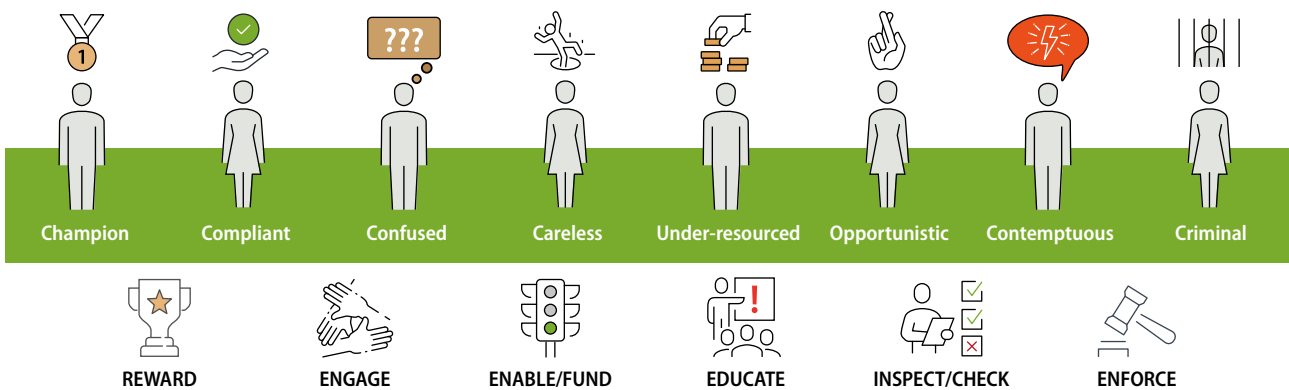
Introduction

IMPORTANCE OF ADDRESSING DIFFERENT TYPES OF BEHAVIOUR

Responses to polluters must be tailored to different types of behaviour to make enforcement effective. These range from rewarding the best performers to taking enforcement action against criminal

non-compliance. This approach is effective because it aims to understand and address the root causes of polluters' behaviour and provide positive reinforcement to those that comply.

The EU policy framework for environmental compliance assurance: Types of behaviour and responses



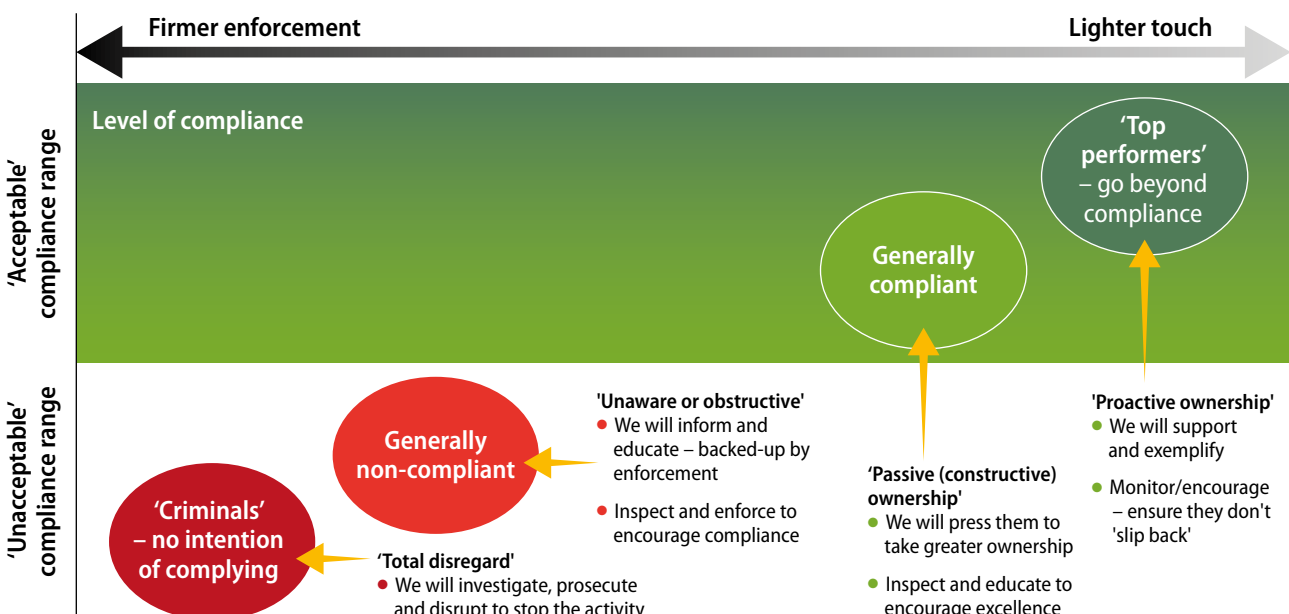
Source: European Commission.

RISK-BASED APPROACHES INCREASE EFFECTIVENESS AND REDUCE COSTS OF COMPLIANCE ASSURANCE

The likelihood of non-compliance can help establish policy priorities and plan environmental inspections. Focusing on the highest-risk activities helps authorities

increase the effectiveness of compliance assurance, while reducing administrative costs.

Compliance-enforcement model of the Environment Agency of England



Source: Duncan Giddens, presentation at the EU4Environment first regional compliance assurance meeting, 25 November 2020.

A man wearing a yellow hard hat, safety glasses, and a high-visibility green vest over a purple shirt is looking upwards and to the right. He is holding a clipboard and a pen, appearing to be taking notes or inspecting something. The background shows a dark, possibly metallic, structure.

Environmental compliance assurance in the Eastern Partnership countries

Promotion of voluntary compliance

Several challenges existed...

Environmental compliance systems in the EaP countries (Armenia, Azerbaijan, Belarus¹, Georgia, the Republic of Moldova², Ukraine) have long suffered from many pitfalls. These included unrealistic regulatory requirements, which were costly to implement and difficult to enforce. The “firefighting” approach and emphasis on sanctions, rather than prevention of non-compliance, inhibited the performance of environmental enforcement agencies. Moreover, the focus on collection of pollution charges and fines for non-compliance created perverse incentives for inspectors.

At the same time, sanctions failed to provide sufficient deterrence. The “zero tolerance” rule was applied selectively, for example, because of political pressures, opaque decision making or corruption. Indicators and data analysis practices provided limited support to strategic and operational management. Meanwhile, the need to interact with non-governmental organisations (NGOs) to promote compliance was accepted, but actual co-operation was usually unsatisfactory. The probability of discovering non-compliance remained low due to legal restrictions on planned inspections.

While such restrictions were introduced to fight corruption and reduce the administrative burden on businesses, more promising strategies were often overlooked. Assuring transparency of decision making, procedures and activity results, for example, received marginal attention. As institutional capacities remained low, especially at subnational level, the impact of regulation and compliance assurance remained modest.

... but important progress has been made

Building on two decades of efforts, the EaP countries have made important progress in strengthening their environmental compliance assurance systems. Since 2019, the EaP countries have increased use of awareness-raising measures about environmental regulations.



These efforts complement enforcement, notably through use of campaigns, websites and social media. In some cases, EaP countries have created bodies dedicated to raising awareness.

Some EaP countries established new environmental inspectorates and strengthened their capacities. For example, some countries have digitised information systems, modernised inspection equipment or adopted risk criteria for planned inspections. Others have established the legal basis for integrated inspections by adopting laws on industrial emissions.

EaP countries have been using a range of tools to receive alerts about environmental non-compliance to supplement physical inspections. These include developing applications for lodging complaints; self-monitoring and reporting by regulated entities, including Pollutant Release and Transfer Registers (PRTRs); and ambient monitoring of the environment, complemented by capacity building of laboratories and environmental monitoring stations.

Penalties for environmental non-compliance generally follow the good practice of an “enforcement pyramid”. Enforcement may begin with warnings and administrative fines, rising to court cases that can lead to imprisonment. Recently, some EaP countries have begun revising penalties for non-compliance to increase their deterrent effect on polluters. Some countries have developed liability provisions that require offenders to remediate their environmental damage.

The following sections present progress achieved during the last four years in promoting, monitoring and enforcing environmental compliance assurance in the Eastern Partnership countries, as well as some remaining challenges.

1. In line with the Council Conclusions of 12 October 2020 and in light of Belarus's involvement in the Russian military aggression against Ukraine, recognised in the European Council Conclusions of February 2022, the EU has stopped engaging with representatives of Belarus public bodies and state-owned enterprises. Should there be a change of the context this may be reconsidered. In the meantime, the EU continues to engage with and, where possible, has stepped up support to non-state, local and regional actors, including within the framework of this action as appropriate.

2. Hereinafter referred to as “Moldova”.

RAISING AWARENESS TO PROMOTE VOLUNTARY COMPLIANCE AMONG THE REGULATED ENTITIES

EaP countries have been doing more awareness raising activities about environmental regulations to complement enforcement action:

- Countries undertake **awareness-raising campaigns**, mostly aimed at the general public. Recent examples include Armenia's campaign "Social Environmental Advertisement: Let's Listen to Lake Sevan", organised jointly by the Environmental Protection and Mining Inspection Body of Armenia (EPMIB) and the Ministry of Environment; Moldova's national campaign on "Clean River from Village to Village", organised by its Inspectorate for Environmental Protection; and Georgia's Green Award to teachers for environmental and agricultural education, organised by its Ministry of Environmental Protection and Agriculture (MEPA).
- Environmental inspectorates of Armenia and Azerbaijan are required to have yearly **awareness-raising plans**.
- Most environmental inspectorates in the EaP countries have a **dedicated website**. Content varies

from country to country, but it includes laws and regulations, inspection plans and reports, and news on inspections and enforcement. Georgia, Moldova and Ukraine publish environmental inspection plans and reports.

- Inspectorates organise **meetings with the private sector** to explain environmental regulations, although such meetings are infrequent, and little information is available about them.
- Environmental authorities increasingly use **social media** such as Facebook and Instagram to share information.
- Finally, some countries have set up **dedicated institutions** to share environmental information and raise awareness, notably the Division for Environmental Education and Communication of the Ministry of Ecology and Natural Resources (MENR) of Azerbaijan and Georgia's Environmental Information and Education Centre (EIEC) under the MEPA.



The annual plan of preventive and awareness-raising measures of the Environmental Protection and Mining Inspection Body (EPMIB) of ARMENIA



According to the 2014 Law on Inspection Bodies, the EPMIB must develop an annual plan of preventive and awareness-raising measures. Its 2020 Annual Awareness and Action Plan had nine actions that included press conferences and briefings based on risk analysis. The EPMIB has ambitious plans to step up its awareness-raising activities through publishing on line additional information on air pollution, water contamination and polluter liability; developing and sharing with economic entities guidelines on control of the environment in the subsoil sector; and installing information boards on fines in recreational areas such as national parks.



Awareness-raising activities of the Division of Environmental Education and Communication of the Ministry of Ecology and Natural Resources (MENR) of AZERBAIJAN



The Division of Environmental Education and Communication of the MENR of Azerbaijan is dedicated to information-sharing and awareness raising activities aimed at the general public. On "Expert Hour", for example, a new expert is invited every week to provide information on a specific subject for one hour. It also publishes "One Question One Answer" articles on social media, which provide detailed answers to environmental questions such as about hunting.

Promotion of voluntary compliance



GEORGIA'S Environmental Information and Education Centre (EIEC)



Georgia's Environmental Information and Education Centre (EIEC) of the MEPA, which was established in 2013, promotes environmental and agricultural education, raises public awareness, supports participation of the public in decision making and ensures access to information.

The EIEC organises training for various stakeholders, including children, students, teachers, the private sector, civil society and MEPA officials, usually for free. Topics have included extended producer responsibility, environmental liability, waste management, the green economy, environmental democracy and human rights. It is developing a course on Georgia's new Law on Environmental Liability and an on line management and training platform with support of the GIZ. The EIEC also organises meetings with the private sector on topics such as environmental legislation. Its website contains environmental reports, strategies and documents, and is available to people with disabilities.

Remaining challenges and recommendations for effective promotion of voluntary compliance

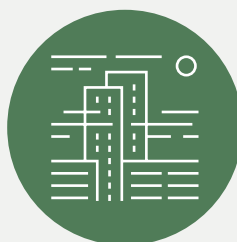
Despite significant progress in using information-based instruments to promote voluntary compliance with environmental regulations, there are several areas for improvement:

- For the most part, **awareness about environmental regulations remains low** among the regulated community. Most awareness-raising activities by ministries of environment and inspectorates target the general public. Countries could aim more activities at the regulated community. These could include awareness raising and training about how to comply with environmental regulations, as well as on how to adopt green practices and environmental management systems. Events could also target specific business groups. If there is a lack of resources, promotion could focus on higher-risk activities.
- **Information-sharing tends to be reactive** rather than proactive, with the public and regulated entities needing to search for and request information. Information could be shared more proactively via various channels, including through notifications to individual regulated entities and through business associations.

- **The quality of information provided on the websites of environmental inspectorates can be improved.**

Environmental compliance assurance in Moldova was surveyed within the framework of EU4Environment Action. Most respondents to this OECD survey gave low ratings to information on the inspectorate's website. In all, 67% of private sector respondents and 65% of NGO respondents categorised information on the inspectorate's website as poor/relatively poor. The on line information-sharing platforms should be evaluated and made more user-friendly. For example, more detail can be provided on enforcement policies, and inspection plans and results should be publicly available in all EaP countries.

- **A wider range of tools can be used** to promote voluntary compliance with regulations. These could complement information sharing and awareness-raising initiatives such as naming and shaming.



ENVIRONMENTAL INSPECTORATES AND INSPECTIONS

Strengthening environmental inspection bodies

In recent years, the institutional arrangements for environmental inspection bodies have been strengthened, and some new inspectorates have been established.

Environmental inspectorates in the Eastern Partnership countries

State Environmental Inspectorate (SEI) of UKRAINE

- Established in 2011
- Reports to the Ministry of Environment
- 18 regional branches
- 1 505 staff
- Risk methodology for planning inspections
- Inspection plans published on line
- Laboratory sampling by the Department of Instrumental and Laboratory Control, Department of State Environmental Supervision (Control), SEI

Department of Environmental Supervision (DES), Ministry of Environmental Protection and Agriculture (MEPA) of GEORGIA

- Established in 2013
- Reports to the MEPA
- 8 regional branches
- 856 staff, including 120 inspectors
- Risk methodology for planning inspections
- Inspection plans published on line
- No inspector rotation
- Laboratory sampling by the DES and the National Environmental Agency of the MEPA



Inspectorate for Environmental Protection (IEP) of MOLDOVA

- Established in 2018
- Reports to the Ministry of Environment
- 35 regional branches
- 188 staff, including 150 inspectors
- Risk methodology for planning inspections
- Inspection plans published on line
- No inspector rotation
- Laboratory sampling by the Reference Laboratory of the Ministry of Environment

State Environmental Security Service (SESS), Ministry of Ecology and Natural Resources (MENR) of AZERBAIJAN

- Established in 2020
- Reports to the MENR
- Supported by 12 regional offices of the MENR
- 45 staff, including 17 inspectors (SESS)
- 410 staff, including 162 inspectors (MENR regional offices)
- Risk methodology for planning inspections
- No inspection plans published on line
- No inspector rotation (only top managers rotate)
- Laboratory sampling by AzeLab of the MENR



Environmental Protection and Mining Inspection Body (EPMIB) of ARMENIA

- Established in 2017
- Reports to the Prime Minister's Office
- 11 regional branches
- 194 staff, including 130 inspectors
- Risk methodology for planning inspections
- Inspection plans published on line
- No inspector rotation
- Laboratory sampling by the EPMIB and the Hydrometeorology and Monitoring Center State Non-Commercial Organization of the Ministry of Environment



UKRAINE'S Operational Headquarters of the State Environmental Inspectorate

The Russian Federation (hereafter "Russia") launched a full-scale unprovoked war of aggression against Ukraine on 24 February 2022. Ukraine established its Operational Headquarters for the State Environmental Inspectorate (SEI) on 1 March 2022. This aimed to create a unified system of control during the war to assess and record environmental damage caused by Russia's aggression.

SEI developed **seven methodologies for assessing environmental damage from the war**, which have been approved by the Ministry of Environment and Natural Resources of Ukraine:

1. atmospheric air
2. water resources
3. subsoil
4. land and soil
5. the forest fund
6. the territorial sea, exclusive maritime (economic) zone and internal sea waters of Ukraine in the Azov and Black seas
7. the nature reserve fund.

In addition, the Operational Headquarters maintains a **unified register of damages to the environment resulting from Russia's war of aggression against Ukraine**.

Finally, it has set up a **task force to approximate EU legislation in the area of environmental control**.



Source: Presentation of Oleksandr Stavniichuk, Deputy Head of the Department of Environmental Control and Methodologies and Head of the Environmental Control Unit, Ministry of Environment and Natural Resources of Ukraine, at the third EU4Environment regional environmental compliance assurance seminar on "Better environmental inspections for stronger environmental resilience", 15 December 2023.



THE INFORMAL INTER-AGENCY GROUP ON ASSESSMENT OF ENVIRONMENTAL DAMAGE

The United Nations Economic Commission for Europe (UNECE), the United Nations Environment Programme and the OECD, together with partners such as the United Nations Development Programme, the United Nations Industrial Development Organization, the World Bank and the Organization for Security and Co-operation in Europe, have joined forces through an inter-agency group to support assessment of environmental damage in Ukraine. The group facilitates co-operation among different actors and enhances coherence between the assessment methods. In this way, they plan to inform policies for the post-war green reconstruction and recovery of Ukraine.

Environmental inspectorates and inspections

The newly established environmental inspectorates exhibit many positive features in their organisation and in carrying out of inspections. Notably:

- **Inspection and permitting functions** are clearly separated.
- Inspectorates have **regional offices** that support the central offices in their work.
- Inspectorates are **prioritising development of electronic information management systems**. For example, Azerbaijan has recently digitised its Penalty Protocols Management System and has distributed electronic tablets to inspectors. For its part, Georgia has put in place several electronic systems (including an internal system on regulated entities and violations) and plans to introduce an e-system for inspection management and risk qualification. Armenia plans to put in place an electronic control system and to obtain electronic tablets for inspectors. Meanwhile, Ukraine plans to establish an information system aggregating information on permits issued, monitoring, reporting and inspections.
- **Guidance documents** govern the behaviour of inspectors and inspection procedures: an inspection guidance document with a standard checklist in Armenia; the Law "On Regulation of Inspections Conducted in the Field of Entrepreneurship and Protection of Entrepreneurs' Interests" in Azerbaijan; the "Rules for Exercising State Control by the Department of Environmental Supervision, State Subordinate Agency of the Ministry of Environment and Natural Resource Protection of Georgia" in Georgia; Law no. 131 on State Control of Entrepreneurship Activities in Moldova; and the draft Law on State Environmental Control in Ukraine.
- Inspectorates are increasingly using **risk-based approaches** to plan inspections with varying degrees of inspection frequency: risk methodologies were adopted in Azerbaijan (as part of its overarching 2013 law regulating inspections), Moldova (2018), Armenia (2019), Georgia (2019) and Ukraine (2019).
- Georgia, Moldova and Ukraine are progressing with establishing a legal basis for **integrated environmental control and inspections** by drafting/adopting laws on industrial emissions. These correspond to the EU Industrial Emissions Directive (IED).
- Some **training is provided to inspectors**. For example, Armenia's inspectors recently received training on risk assessment from the Technical Assistance and Information Exchange Instrument of the European Commission; in Azerbaijan, newly recruited inspectors receive training from a mentor during the first six months on the job followed by an additional three months of practical training; groups of Georgia's inspectors receive targeted training several times a year; and Moldova's inspectors take part in annual training on legislation and in field trips.
- Some inspectorates have **procedures for monitoring inspectorates/inspectors' performance**: The Prime Minister's Office and a management board evaluate Armenia's EPMIB annually, while inspectors are evaluated yearly according to set criteria; in Moldova, the inspectorate reports annually to the Ministry of Environment, while the head of the inspectorate is evaluated quarterly; inspectors are evaluated every three months, with a final evaluation at the end of the year resulting in possible salary bonuses.
- Some environmental inspectorates, notably of Azerbaijan and Moldova, actively take part in **elaboration of environmental laws**. Notably, Azerbaijan's SESS drafted amendments to the Code of Administrative Offences and the Criminal Code, and proposed a law on the protection of greenery, which were all adopted.





Centralised inspection registries in AZERBAIJAN and MOLDOVA



Azerbaijan's electronic inspection registry collects information on inspections for all economic sectors, including inspection plans and results. The registry, maintained by the Ministry of Justice, can be accessed by various government agencies and businesses. The ministry analyses the registry and reports quarterly to the Prime Minister and the President of Azerbaijan. As the dataset in the registry is based on tax identification numbers of entities, it has high accuracy. However, the registry analyses only basic data; its potential for analysis must be fully harnessed.

Moldova's electronic State Registry of Control provides a centralised information repository for inspection plans and results. The registry, maintained by the State Chancellery, is also used to evaluate inspectors' activity. The Ministry of Interior verifies the registry, informs an inspectorate about missed deadlines, and penalises inspectors that do not prepare minutes of their inspection activities.



MOLDOVA's risk methodology for planning environmental inspections



The "Decision on approval of the methodology for state control of entrepreneurial activity based on risk analysis in areas within the competence of the Inspectorate for Environmental Protection of Moldova" establishes risk of permitted entities based on:

- the field/subdomain of the economic activity (based on a List of Economic Activities in the field of competence of the inspectorate, which itself is based on the Classifier of Economic Activities of Moldova)
- the history of compliance of the permitted entity with legislative provisions, including proscriptions
- possession of environmental permitting documents by the permitted entity and compliance with them
- location of the unit subject to control in relation to vulnerable environmental objects.

The document also specifies additional risk criteria for various environmental media, with each criterion divided into points/levels of intensity/severity.

The methodology applies to almost all inspectorate activities, including annual planning of inspections; deciding on the need for ad hoc inspections; deciding on an appropriate response to a complaint about regulatory non-compliance; preparing inspection questionnaires; and strategic planning of control activity.

The methodology provides for regular review of the weights assigned to the risk criteria based on results of inspections or new available data. The inspectorate maintains a database of entities subject to inspections through the State Registry of Control, including the history of their activity and information used for risk criteria assessment. It updates the information every year.

Remaining challenges for environmental inspectorates and inspections

Despite progress, environmental inspectorates and inspections in the Eastern Partnership countries have several remaining challenges:

- **Co-ordination** between permitting and environmental control institutions is insufficient and should be increased. Environmental inspectorates should ideally be able to comment on important environmental legislation and permits. A memorandum of understanding based on achieving environmental goals could be an option.
- Inspectorates **lack a complete and up-to-date overview of all the operations/enterprises** that must comply with environmental requirements. Ideally, information should be available on the number, location and risk of permitted entities, and shared by inspection and permitting institutions.
- **High turnover leads to insufficient qualifications** among inspectorate staff and inspectors. The turnover is due to many reasons such as more lucrative working conditions in the private sector and insufficient training. While ad hoc training is generally provided, there are no skills gap analysis or long-term competency schemes in place. These are needed to maintain skills of existing staff and train new staff.
- Some inspectorates **lack electronic information systems**. For example, Moldova's inspectorate and Armenia's EPMIB mostly manage information manually, including permits and inspection results. Georgia's database for registering violations is obsolete.
- Some inspectorates do not have enough **equipment** such as electronic tablets for inspectors to use for onsite inspections and recording of results. Resourcing plans should be developed and resources allocated to meet inspectorates' equipment needs.
- **Sampling laboratories** lack accreditation in all countries but Moldova. They also often have obsolete equipment and lack automated sampling equipment. For example, Armenia's inspectorate laboratory



cannot analyse water samples completely, and Moldova's laboratory equipment dates from the 1960s-70s. Azerbaijan's AzeLab has advanced laboratory equipment but lacks resources for repair and refurbishment. Most laboratories in the region do not have Laboratory Information Management Systems.

- Some countries, notably Armenia, Georgia and Moldova, have too **few planned inspections**. Potential reasons for this (e.g. lack of resources, poor prioritisation, too much time on site, long inspection reports) should be examined and addressed. Inspection plans should be developed so that inspectors are most likely to respect them. Multi-annual inspection plans could be used as the basis for annual ones.
- **Integrity** remains a concern in environmental inspectorates. This was a possible reason behind Azerbaijan's moratorium on planned environmental inspections of private companies. The moratorium, in place since 2015, aimed to reduce the administrative burden of these companies. Measures to address corruption could include ensuring the same inspectors do not visit the same site regularly (in most EaP countries **inspectors do not rotate**); training; publication of inspection plans and reports (which some countries still do not publish); use of chest cameras; and use of photographic evidence to support non-compliance reporting.
- **Risk methodologies** should be further refined. There must be provisions for regular reviews of the risk categories. Azerbaijan would benefit from a stand-alone risk assessment methodology, which is the case in other EaP countries.

USE OF OTHER MONITORING TOOLS TO DETECT NON-COMPLIANCE

Receiving and processing environmental complaints

To supplement physical inspections, EaP countries have been using tools to receive alerts about environmental non-compliance, including hotlines, SMS alerts, letters, websites and social media. Countries have been developing applications for lodging complaints: Azerbaijan's MENR has an on line "EcoRadar" application, while Moldova has an "EcoAlert" application, available both on line and on mobile phones (see *In Focus*). Azerbaijan also actively uses social media (Facebook, Instagram and WhatsApp), which are managed by the Environmental Education and Communications Department of the MENR. In 2022, this department received 1 148 complaints through social media and directed them to the responsible parties within the MENR.

Despite various reporting tools, mechanisms are needed to monitor how received alerts are handled. EaP countries should establish systems for managing complaints, ideally in an electronic format. In most cases, it takes a long time to process alerts; this response should be sped up to almost real time. In addition, immediate 24/7 response capacity is undeveloped in the region, including in Armenia, Azerbaijan and Moldova.

Georgia has a 24/7 immediate response team, which it recently expanded. However, this team does not cover the entire country and deals only with less severe incidents such as poaching, illegal logging and fishing.

Self-monitoring and reporting of emissions by polluters

All EaP countries have self-monitoring, and business entities usually report emissions annually (quarterly in Armenia). Armenia and Moldova penalise companies that do not comply with reporting requirements. Some countries have electronic reporting systems. Georgia, for example, has such a system for air emissions, and expects that another one to monitor land and soil will be in place by 2025. In addition, Georgia has required large companies to do continuous self-monitoring since June 2021 (see *In Focus*). Moldova has an electronic Automated Waste Management Information System.

Ensuring that self-monitoring reports are submitted in a timely manner and verified remains challenging. This is especially the case in Azerbaijan, whose system is paper-based. Azerbaijan should establish an electronic system to support effective permitting, monitoring and reporting.



Continuous self-monitoring in GEORGIA

In Georgia, 94 large stationary facilities are required to register in an electronic system of continuous self-monitoring. The system receives data from devices installed at operators' emission sources. More action is needed to speed up the adoption of continuous monitoring: only 31 companies were registered as of March 2024.



EcoAlert application in MOLDOVA

The Inspectorate for Environmental Protection of Moldova launched an electronic application (app) "EcoAlert" in 2020 (<https://ecoalert.md/>). EcoAlert, designed by the National Environmental Center (an NGO), is a good example of co-operation between civil society and the inspectorate. The app receives alerts from members of the public, who authenticate their identities. These alerts, which can be accompanied by pictures, use the Global Positioning System. The app provides progress reports to users who have registered complaints. The main challenges are filtering out unfounded alerts and a lack of staff to handle alerts in a timely manner.





Establishment of Pollutant Release and Transfer Registers (PRTRs)

A PRTR is a publicly accessible database or inventory of chemicals or pollutants released to air, water and soil, and transferred off-site for treatment. PRTRs usually require facility owners or operators to quantify their releases and report them on a regular basis. PRTRs are useful for government agencies, the public, the companies themselves and other stakeholders. By making data accessible, PRTRs increase transparency and put pressure on companies to reduce pollution.

All EaP countries except for Azerbaijan have signed the Protocol on Pollutant Release and Transfer Registers to the Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters. Only two EaP countries have ratified it so far: Moldova on 23 December 2013 and Ukraine on 2 May 2016. Consequently, only Moldova and Ukraine have made progress on establishing a PRTR. They will need to ensure there is a mechanism for checking reports to their PRTRs.



MOLDOVA's Pollutant Release and Transfer Register

In 2018, Moldova established an electronic Pollutant Release and Transfer Register (e-PRTR) and adopted a regulation on the PRTR. This PRTR aims to collect reported information from operators and make it publicly available. Operators must report emissions annually and explain their calculations. To support self-monitoring, companies are required to prepare a monitoring plan and to keep records for five years.

Several entities feed data into the PRTR in addition to the registered operators: the Inspectorate for Environmental Protection, the Apele Moldovei Agency, the National Agency for Food Safety, the Public Services Agency and the National Bureau of Statistics. The Environmental Agency maintains the PRTR.

Moldova plans to integrate the PRTR into various other information systems. It is also developing a user's guide. Between 2018-23, registrations in the e-PRTR increased from 188 to 700.



UKRAINE's Pollutant Release and Transfer Register

Ukraine's PRTR became operational in October 2023 following the country's adoption of the Law on the National Pollution Release and Transfer Register in October 2022. Ukraine plans to integrate its PRTR into the European PRTR within two years, allowing for an exchange of data. Eight enterprises have registered as of January 2024.

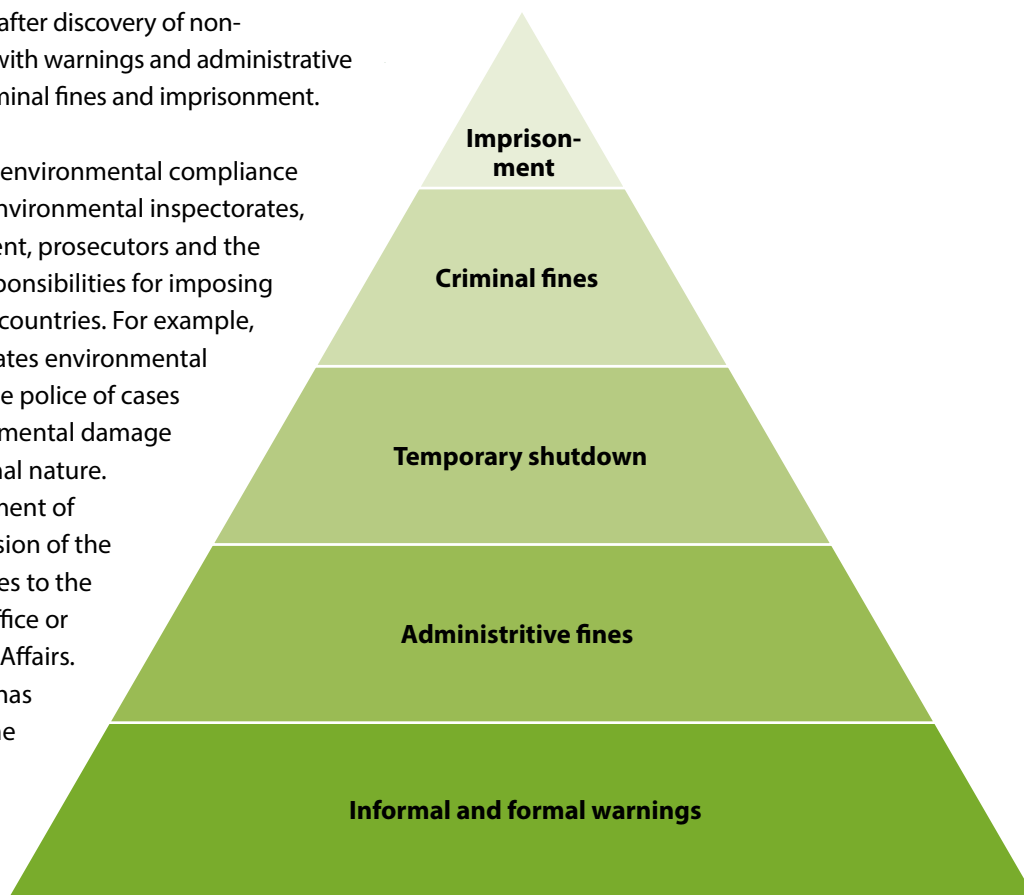


PENALTIES FOR NON-COMPLIANCE AND ENFORCEMENT OF COMPLIANCE

Penalties for environmental non-compliance available in the EaP countries generally follow the standard “enforcement pyramid” after discovery of non-compliance. This starts with warnings and administrative fines, and ends with criminal fines and imprisonment.

Institutions involved in environmental compliance assurance are usually environmental inspectorates, ministries of environment, prosecutors and the police. Institutional responsibilities for imposing penalties differ among countries. For example, Armenia’s EPMIB calculates environmental damage and informs the police of cases with both high environmental damage and a potentially criminal nature. In Georgia, the Department of Environmental Supervision of the MEPA submits such cases to the General Prosecutor’s Office or the Ministry of Internal Affairs. However, as of 2021, it has the right to restrict some business activities of offenders.

Standard environmental enforcement pyramid



Penalties for environmental non-compliance in the Eastern Partnership countries

Country	Available penalties
ARMENIA	<ul style="list-style-type: none"> ● Warnings and instructions to an operator to remove non-compliance in case of non-significant environmental damage. ● Fines according to the Administrative Code (set in relation to minimum wage), with distinction between citizens and officials; in some cases, repeat violations lead to higher fines. ● Increases in taxation when permitted pollution levels are exceeded, proportionate to the level of exceedance, and sometimes increasing for repeat offences. ● Compensation for environmental damage based on methodologies from 2003 and 2005 (regarding atmosphere, land, water, and flora and fauna) and calculated through software. ● Suspension/revocation of permits by the Ministry of Environment, which can comprise a hearing with the operator. ● Criminal penalties according to Section 10 of the Criminal Code, including fines (set in relation to minimum wage), banning from certain positions/activities, arrest, imprisonment; the gravity of an offence is considered in setting the penalty in some cases.

Country	Available penalties
AZERBAIJAN	<ul style="list-style-type: none"> ● Action plans with recommendations to remove non-compliance by a deadline. ● Fines according to the Administrative Code (distinguishing between officials, physical and legal persons); in some cases, repeat violations lead to higher fines. ● Compensation for environmental damage, calculated during an investigation. ● Suspension/withdrawal of licences and permits. ● Criminal penalties according to the Criminal Code, including fines, corrective works, limiting of freedom, banning from certain posts or engaging in certain activity, imprisonment.
GEORGIA	<ul style="list-style-type: none"> ● Instructions to remove a violation. ● Administrative penalties according to the Administrative Code, including warnings, fines (sometimes expressed in relation to minimum wage, and sometimes distinguishing between an official/legal person and a regular individual), administrative detention, confiscation; repeat offences, in some cases, have harsher penalties. ● Restriction/suspension of an activity according to the Law on Environmental Protection and the Ordinance on the Procedure for Carrying out State Control by the Department of Environmental Supervision of the MEPA. ● Criminal penalties according to the Criminal Code, including fines, correctional work, confiscation of property, house arrest and deprivation of the right to hold office or work, liquidation, deprivation of the right to operate and imprisonment; repeat offences lead to harsher penalties, in some cases; the gravity of the offence is considered in setting the penalty, in certain instances.
MOLDOVA	<ul style="list-style-type: none"> ● Verbal and written warnings for cases of non-compliance specified in legislation. ● Administrative penalties according to the Contravention Code, including warnings; community service/unpaid labour for a company; administrative fines (expressed in “conventional units”) distinguishing between officials, and physical and legal entities; suspension of activity. ● Payments for environmental damage according to the Law on Environmental Protection and industry-specific instructions with indicators and formulas (including for soil damage; air pollution from stationary resources; subsoil damage; air damage from management of production of waste and household waste; and damage caused by illegal hunting, and acquisition, marketing, possession and export of game animals). ● Licence revocations and cessation of activities. ● Criminal penalties according to the Criminal Code, including fines (in “conventional units”), deprivation of a right to hold certain positions or exercise certain activities, liquidation of a legal entity, unpaid community service and imprisonment; distinguishing between legal entities and others (in some cases, officials); the gravity of the offence is considered in setting the penalty, in certain instances. <p>Note: reparation of environmental damage is a mitigating factor in setting a penalty.</p>
UKRAINE	<ul style="list-style-type: none"> ● Warnings (proscriptions) for remedying a violation issued after an inspection. ● Administrative sanctions according to the Administrative Code, including warnings, fines (expressed in relation to tax-free minimum incomes, in some cases distinguishing between individuals, officials and companies), confiscation, arrest, deprivation of the right to hold certain positions or engage in certain activities; in some cases, repetition of the offence leads to a higher penalty. ● Compensation for environmental damage (Ukraine’s SEI calculates the monetary cost of compensation). ● Criminal penalties according to the Criminal Code, including fines (expressed in relation to minimum tax-free incomes), community service, arrest, restriction of liberty, deprivation of the right to hold certain positions or engage in certain activities, forfeiture of property, imprisonment; sometimes repetition, intent and gravity of an offence lead to higher penalties; in some cases, penalties single out the transgressions of individual officials.

Penalties and enforcement

Some EaP countries are revising their legislation governing penalties for non-compliance or are planning to do so:

- **Armenia** plans to revise its legislation on environmental damages in the framework of the Comprehensive and Enhanced Partnership Agreement (CEPA) with the European Union and to increase fine levels for non-compliance.
- **Azerbaijan** recently increased its environmental fine levels. Notably, some fine levels for illegal tree cutting were doubled or tripled. Measures for revising penalties in the Administrative and the Criminal Codes are under consideration.
- **Georgia** increased fine levels in 2021 for industrial emissions that do not use a dust collection system, for non-compliance with permit conditions and for operating without a permit. In 2023, Georgia approved a new article in its Code of Administrative Offences on “Exceeding the established norm of emissions of harmful substances from vehicle exhaust”. It establishes administrative fines for violations of established norms for harmful substances in vehicle exhaust. Georgia is further revising the Administrative Offence Code and the Criminal Code. It plans to implement harsher penalties for mining without a licence and for illegal felling and transportation of timber. Criminal liability will be established for fishing with prohibited devices such as electrofishing.
- **Moldova** approved amendments in June 2023 to environmental chapters of the Criminal Code and the Contravention Code, which were sent to Parliament for consideration. It also plans to revise instructions for calculating environmental damages.
- **Ukraine’s** draft “Law on State Environmental Control” aims to increase environmental fines.



AZERBAIJAN’s prosecutors receive environmental training

In 2020, Azerbaijan’s Prosecutor General’s Office established a department for non-criminal proceedings to examine offences by legal and physical persons. It has 14 staff members. The department co-operates closely with the SESS and provides some environmental training to its prosecutors, notably by secondment of prosecutors to the SESS and on line training.

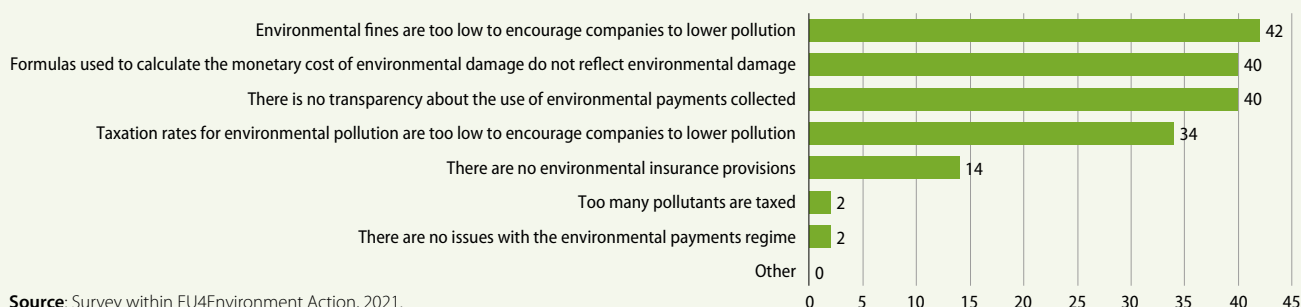


MOLDOVA’s consultations on revising penalties for non-compliance

The General Prosecutor’s Office of Moldova created a working group in the fall of 2019 to elaborate amendments to the Criminal Code’s chapter on environmental crimes; it submitted a set of amendments to the Ministry of Justice in March 2020. The working group comprised representatives of the former Ministry of Agriculture, Regional Development and Environment, the Inspectorate for Environmental Protection, civil society and academia. In June 2023, the amendments were approved and sent to Parliament for adoption.



NGO views on the biggest weakness of the environmental payments regime in Moldova



Source: Survey within EU4Environment Action, 2021.



ENVIRONMENTAL LIABILITY PROVISIONS

With respect to environmental damage by polluters, EaP countries have relied mostly on payments from polluters as compensation. However, most countries lack a system that requires polluters to remedy environmental damage – an approach used by the EU Environmental Liability Directive (ELD). Moreover, a legal framework for financial security for environmental damage is generally lacking in the EaP region.

In recent years, some EaP countries have begun developing environmental liability provisions, notably Armenia, Georgia and Moldova. Approximation of the EU ELD is part of Armenia's CEPA and the Georgia-EU Association Agreement. In 2021, Georgia adopted a stand-alone law on Environmental Liability with the goal of approximating the EU ELD – a first in the region.



GEORGIA'S Law on Environmental Liability

Georgia's Law on Environmental Liability was adopted on 2 March 2021 and entered into force on 1 July 2022.



The law addresses prevention of environmental damage in case of an imminent threat of such damage, mitigation of damage, remediation of significant damage to the environment and monetary compensation for environmental damage.

Appendix I of the law includes criteria for determining significant damage to biodiversity, land and water, while Appendix II identifies activities that are particularly hazardous for the environment.

The law foresees establishment of an "Environmental Programme" on environmental measures, which will collect monetary compensation from polluters for environmental damage.

Two departments of the MEPA will implement the law: the National Environmental Agency and the DES.

The law diverges from the EU ELD in several instances. Notably, it establishes strong reliance on the state budget for prevention and remediation requirements through the Environment Programme, does not apply to privately owned land, has narrow definitions of "environmental damage" and "industrial accident", and has somewhat arbitrary criteria for what qualifies as significant damage.

Source: The environmental compliance assurance system in Georgia: Current situation and recommendations, EU4Environment, 2023.

Remaining challenges for enforcement of compliance in the Eastern Partnership countries

- All the EaP countries lack a **comprehensive and publicly available enforcement policy guidance document**. Such a document can provide information on the assessment and determination of offences, application of penalties and any required follow-up. An enforcement policy document will make the application of penalties more transparent and predictable. It will ensure that penalties are applied more consistently to comparable cases.
- **Legislation establishing environmental penalties is largely outdated**, including administrative and criminal codes, as well as methodologies setting out calculation of compensation for environmental damage.
- Despite a range of available penalties to punish environmental non-compliance, **administrative fines are the most frequently used and there is a reluctance to use other penalties**. A broader set of penalties should be considered and applied, including naming and shaming; mutually agreed plans with companies to upgrade their technology, including binding dates and milestones with punishment in case of non-fulfilment; and enforcement undertakings (where an offender volunteers to restore and remediate the local environment and to prevent another case of non-compliance in exchange for the regulator lifting or reducing monetary penalties).
- There is a **reluctance to use criminal penalties**, notably in Azerbaijan and in Georgia, which should be addressed. In Azerbaijan, most criminal penalties concern less severe cases of non-compliance such as forestry, hunting and fishing rather than large-scale industrial sites. This may be due to a **lack of prosecutors that specialise in environmental matters** and lack of environmental training for prosecutors. In a positive development, Azerbaijan has begun providing specialised training to environmental prosecutors. In Georgia, investigation of criminal cases takes a long time and possible gaps in the collection of evidence should be addressed.



In Armenia, court procedures are also considered cumbersome, which results in a reluctance to use courts for appealing penalties.

- For the most part, **environmental fine levels are low and insufficient to prevent non-compliance**. Fine levels should be raised and index-linked to inflation to provide a more significant deterrent effect on non-compliant entities. In addition, EaP countries need to ensure their formulas are transparent, fair and realistic. In a positive development, some countries have recently increased environmental fine levels. Any updates to this legislation should consider and remove as much as possible the benefits of non-compliance to regulated entities.
- Some countries have **low collection rates of administrative fines**. The low collection rate of fines must be addressed or other enforcement tools should be considered instead.
- EaP countries **lack provisions for environmental liability of polluters for environmental damage** in the sense of the EU ELD. While they provide for monetary compensation for environmental damage, countries generally do not require polluters to remediate the environmental damage incurred. However, Georgia recently adopted the Law on Environmental Liability, which aims to transpose the EU ELD.
- The region **lacks financial security provisions for environmental damage**. In a welcome move, Georgia's new Law on Environmental Liability provides for financial security instruments.

A man and a woman are in a field of large green leaves, likely a vegetable field. The man is on the left, wearing a plaid shirt and jeans, looking down at the plants. The woman is on the right, wearing a blue plaid shirt and a yellow apron, holding a silver laptop and looking at the screen. The background is a vast field of similar plants under bright, natural light.

Long-standing support to improving environmental compliance assurance in the Eastern Partnership countries

EUROPEAN COMMISSION ACTIVITIES

The European Commission has supported development of environmental compliance assurance systems in the Eastern Partnership countries through regional and country-level activities.

The joint communication “Eastern Partnership Policy beyond 2020, Reinforcing Resilience – an Eastern

Partnership that delivers for all” suggests the following reform priorities in the region: investment in environmental governance; the sound planning of policies and investments; administrative capacity to implement and enforce legislation; enhanced public access to information, awareness and participation; and more adapted and effective financing mechanisms.

EU support to compliance assurance in the Eastern Partnership countries

Regional programmes

EU regional programmes with the Eastern Partnership have been worth over EUR 80 million.

The ongoing projects are EU4Environment (ending in 2024), EMBLAS+ and EU Water Initiative +.

Some previous programmes are Greening Economies in the Eastern Neighbourhood (EaP GREEN) and the EU Water Initiative in Eastern Europe, the Caucasus and Central Asia.



Technical Assistance and Information Exchange instrument of the European Commission (TAIEX)

TAIEX supports public administrations with regard to the approximation, application and enforcement of EU legislation as well as facilitating the sharing of EU best practices through workshops, expert missions and study visits.

In 2022, a TAIEX mission on the EU ELD took place in Armenia.



Twinning

Twinning is a European Union instrument for institutional co-operation between public administrations of EU Member States and of beneficiary or partner countries.

An EU-funded Twinning project aimed at the approximation of the EU IED took place with Georgia.



EU Programme “LIFE”

The EU Programme “LIFE” is the EU’s funding instrument for environment and climate action.

Moldova and Ukraine now have associate status in the programme.



OECD ACTIVITIES

The OECD has been strengthening environmental compliance assurance in the Eastern Partnership countries for over 20 years, notably through the

Environmental Action Programme (EAP) Task Force and the Greening Economies in the European Union's Eastern Neighbourhood (EaP GREEN) Programme.

Flagship publications of the EAP Task Force and the EaP GREEN Programme on environmental compliance assurance in the Eastern Partnership countries

- OECD (2012), Liability for Environmental Damage in Eastern Europe, Caucasus and Central Asia (EECCA): Implementation of Good International Practices
- OECD (2010), Improving the Effectiveness and Efficiency of Environmental Inspections: Risk-based Prioritization and Planning in Moldova
- OECD (2009), Ensuring Environmental Compliance: Trends and Good Practices
- OECD (2009), Determination and Application of Administrative Fines for Environmental Offences: Guidance for Environmental Enforcement Authorities in EECCA Countries
- OECD (2007), Translating Environmental Law into Practice, Progress in Modernizing Environmental Regulation and Compliance Assurance in Eastern Europe, Caucasus and Central Asia
- OECD (2005), Funding Environmental Compliance Assurance: Lessons Learned from International Experience
- OECD (2004), Assuring Environmental Compliance: A Toolkit for Building Better Environmental Inspectorates in Eastern Europe, Caucasus and Central Asia
- OECD (2003), Guiding Principles for Reform of Environmental Enforcement Authorities in Transition Economies of Eastern Europe, Caucasus and Central Asia



EU4ENVIRONMENT ACTIVITIES ON ENVIRONMENTAL COMPLIANCE ASSURANCE

Within the EU-funded EU4Environment: Green Economy Programme (2019-24), the OECD has provided analytical and capacity building support to the EaP countries to

strengthen compliance assurance and liability regimes. Capacity building and networking events reached more than 450 EaP and international experts.

EU4Environment activities on environmental compliance assurance in figures

7
analytical reports

- Reports assessing environmental compliance assurance systems in **Armenia, Moldova** and **Georgia**
- A report assessing environmental inspections and compliance assurance in **Azerbaijan**
- Reports assessing environmental liability provisions in **Armenia** and **Moldova**
- Analysis of how **Ukraine's** draft Law on State Environmental Control corresponds to the OECD Recommendation on Environmental Compliance Assurance

6
national-level meetings

Discussions of report findings with national stakeholders:

- **Armenia** (28 June 2021)
- **Azerbaijan** (5 October 2023)
- **Moldova** (15 September 2021)
- **Armenia** (16 November 2023)
- **Georgia** (28 April 2022)
- **Ukraine** (1 December 2023)

2
national-level trainings

- Training course with **Georgia** on “Identification and assessment of remediation measures for significant environmental damage and preparation of a remediation plan” (4-8 July 2022)
- Webinar with **Ukraine** on “Environmental inspections in the framework of the EU Industrial Emissions Directive and the role of laboratories” (30-31 August 2023)





- **Information systems** used by environmental permitting and inspection authorities (23 July 2021)
- **Joint environmental inspections:** Good practices and lessons learnt (23 June 2022)
- **Liability for environmental damage:** From policy design to application (14-15 September 2022)



- **Online modules** covering EU best practices in promotion, monitoring and enforcement of environmental compliance



- **Risk-based approaches** to environmental compliance assurance (25 November 2020)
- Policies and tools for **enforcement** of environmental compliance (17-18 November 2021)
- Better environmental **inspections** for stronger environmental resilience (5-6 December 2022)
- Applying the **Polluter-Pays Principle** to environmental compliance assurance in the Eastern Partnership (11 March 2024)



- EU4Environment was an Observer in the IMPEL and EUFJE networks.
- It facilitated participation of EaP country representatives in events on air pollution, waste enforcement, assessment of environmental damage, water and land, and verification of self-monitoring and reporting.

SOURCES:

- Environment People Law Ukraine (2022), Law of Ukraine “The National Pollution Release and Transfer Register” – Environment People Law (epl.org.ua).
- European Commission (2018), Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, EU actions to improve environmental compliance and governance.
- European Commission (2016), Study to Assess the Benefits Delivered through the Enforcement of EU Environmental Legislation.
- European Commission (2008), Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on Implementing European Community Environmental Law.
- European Commission (2001), Recommendation 2001/331/EC of the European Parliament and of the Council of 4 April 2001 providing for minimum criteria for environmental inspections in the Member States.
- European Commission (n.d.), Background Document to Commission Initiative on Environmental Compliance Assurance.
- EU Environmental Crime Directive (2024).
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- OECD (n.d.), Introduction to Pollutant Release and Transfer Registers (PRTRs).
- UNECE (2023), UNECE convenes inter-agency group to co-ordinate assessment of environmental damage in Ukraine.
- UNECE (2023), Ukraine introduces mandatory reporting by enterprises on greenhouse gas emissions and other pollutants using UNECE legal tools.



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EU4Environment

Green Economy in Eastern Partnership Countries

EU4Environment aims to help the Eastern Partnership countries to preserve their natural capital and increase people's environmental wellbeing. To that end, it supports environment-related action; demonstrates and unlocks opportunities for greener growth; and sets mechanisms to better manage environmental risks and impacts.

The Action is funded by the European Union and implemented by five Partner organisations: the OECD, the United Nations Economic Commission for Europe, the United Nations Environment Programme, the United Nations Industrial Development Organization and the World Bank based on a budget of some EUR 20 million. The Action implementation period is 2019-24.

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